

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JANY LEVEILLE, et. al.

Defendant.

Case No. **18-CR-2945 WJ**

DEFENDANTS' SECOND AMENDED EXHIBIT LIST

COME NOW Defendants, and hereby provide the following notice of their intent to introduce any of the following exhibits at any trial or hearing in this matter:

		CR
PLAINTIFF'S ATTORNEY George C. Kraehe Kimberly A. Brawley Jackson Tavo Hall	DEFENDANT'S ATTORNEY Siraj Ibn Wahhaj, (Pro Se) Donald Kochersberger (Hujrah Wahhaj) Marshall J. Ray (Hujrah Wahhaj) Ryan J. Villa (Subhanah Wahhaj) Justine Fox (Subhanah Wahhaj) Lucas Morton (Pro Se)	UNITED STATES DISTRICT COURT DISTRICT OF NEW MEXICO
		Trial Dates: September 25, 2023 through _____
PRESIDING JUDGE CHIEF UNITED STATES DISTRICT JUDGE THE HONORABLE WILLIAM P. JOHNSON	COURT REPORTER Mary K. Loughran, CRR, RPR	COURTROOM DEPUTY Richard Garcia

PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBIT
	A1	STIP		X	Drone Video PA00469_2018-06-07_12-45-15_L
	A2	STIP		X	Aerial Surveillance Stills Amalia Home and Land
	B1	STIP		X	FBI Aerial Photos
	B2				Photos taken by Christopher C. Williams
	C				2018_09_06 Post Bulldozing Photos
	D	STIP		X	Still photographs from August 3, 2018 TCSO Lapels
	E	STIP		X	Photos by FBI Alma Ortega 8-6-18
	F1				Family Video GOPR0555 STRICKEN – COURT’S EX 2 09/22/2023 PTC
	F2				Family Video GOPR0557 STRICKEN – COURT’S EX 3 09/22/2023 PTC
	F3				Family Video GOPR0570 STRICKEN – COURT’S EX 4 09/22/2023 PTC
	F4				Family Video 20180128_170111 STRICKEN – COURT’S EX 5 09/22/2023 PTC
	F5				Family Video GOPR0567 STRICKEN – COURT’S EX 6 09/22/2023 PTC
	F6				Family Video 20180203_120302 STRICKEN – COURT’S EX 7 09/22/2023 PTC
	G1	STIP		X	Photograph of Home Def_Leveille 005268-005268 1659 Beecher Street
	G2	STIP		X	Photograph of Home Def_Leveille00 005269-005269 160 Iris Court
	H1				Siraj Ibn Wahhaj Training Materials Def Leveille 001500-001540 Siraj Ibn Wahhaj Georgia training documents
	H2				Siraj Ibn Wahhaj Training Materials Def Leveille 001543-001562 On-line Education-ESI (Executive Security International)
	H3				Siraj Ibn Wahhaj Training Materials ESI Training Materials
	H4				Siraj Ibn Wahhaj Training Materials BN 02428-02430 Siraj Ibn Wahhaj ID Cards
	H5				Siraj Ibn Wahhaj Training Materials Def Leveille 004959-005001 Cert Field Operating Guide
	H6				Siraj Ibn Wahhaj Training Materials Def Leveille 001541-001542 Leonard Holified, Executive Protection Agency LLC (EPA)

	I				Earthship School BN 02601-02610 - Earthship Receipt and Application - Lucas Morton
	J				WITHDRAWN
	K				WITHDRAWN
	L1				Photographs of Physical Evidence Def_Leveille 003622-3625 1B6
	L2				Photographs of Physical Evidence Def_Leveille 004235-4238 1B68
	L3				Photographs of Physical Evidence Def_Leveille 004239-4244 1B69
	L4				Photographs of Physical Evidence Def_Leveille 005084-5096 1B7a
	L5				Photographs of Physical Evidence Def_Leveille 005097-5102 1B9
	L6				Photographs of Physical Evidence Def_Leveille 005103-5104; 5107; 5109 1B20
	L7				Photographs of Physical Evidence Def_Leveille 005110-5121 1B58; 1B74; 1B80
	L8				Photographs of Physical Evidence Def_Leveille 005122-5150 1B59; 1B81; 1B75
	L9				Photographs of Physical Evidence Def_Leveille 005151-5159 1B60; 1B82
	L10				Photographs of Physical Evidence Def_Leveille 005160-5171 1B61
	L11				Photographs of Physical Evidence Def_Leveille 005172-5178 1B62; 1B76
	L12				Photographs of Physical Evidence Def_Leveille 005159-5184 1B63; 1B77
	L13				Photographs of Physical Evidence Def_Leveille 005185-5191 1B64
	L14				Photographs of Physical Evidence Def_Leveille 005192-5195 1B65
	L15				Photographs of Physical Evidence Def_Leveille 005196-5201 1B66; 1B78
	L16				Photographs of Physical Evidence Def_Leveille 005205-5209 1B67
	L17				Photographs of Physical Evidence Def_Leveille 005210-5254 1B70
	L18				Photographs of Physical Evidence Def_Leveille 005255-5258 1B71
	L19				Photographs of Physical Evidence Def_Leveille 005259-5263 1B73
	L20				Photographs of Physical Evidence Def_Leveille 005264-5267 1B79
	L21				Photographs of Physical Evidence Def_Leveille 005081-5083 Ammo
	M				WITHDRAWN
	N				WITHDRAWN
	O				Marriage Documentation Siraj & Jany Def_Leveille 005270-005270 Siraj & Jany Marriage Confirmation STRICKEN – COURT’S EX 8 09/22/2023 PTC

	P	STIP		X	Home Depo Records Def_Leveille 005275-005277 The Home Depot Records
	Q				Family Video GoPro 0068
	R				Axon_Body_2 Video-2018-08-03 820 (1)
	S				Axon_Body_2 Video-2018-08-03 820 (2)
	T				Axon_Body_2 Video-2018-08-03 820 (3)
	U				Axon_Body_2 Video-2018-08-03 820
	V				Axon_Body_2 Video-2018-08-03 821
	W				Axon_Body_2 Video-2018-08-03 828
	X				Axon_Body_2 Video-2018-08-03 906
	Y				Axon_Body_2 Video-2018-08-03 0945
	Z				Axon_Body_2 Video-2018-08-03 1005
	AA				Axon_Body_2 Video-2018-08-03 0959
	BB				Axon_Body_2 Video-2018-08-03 1016
	CC				
	DD				
	EE				
	FF				
	GG				
	HH				
	II				
	JJ				
	KK				
	LL				
	MM				
	NN				
	OO				
	PP				
	QQ				
	RR				
	SS				
	TT				

	UU				
	VV				
	XX				
	YY				
	ZZ				
					Any and all Exhibits identified by the United States
					Any and all Exhibits later identified by Defendants
					Any and all Exhibits that may be revealed through subsequent discovery disclosures and/or during the course of the parties' ongoing investigation.

Respectfully submitted,
THE LAW OFFICE OF RYAN J. VILLA

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Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on September 24, 2023 I filed the foregoing electronically through the CM/ECF system, which caused all parties of record and/or counsel for the parties to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Ryan J. Villa
RYAN J. VILLA